5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION STATEMENT PREPARED BY DOT SURVEYING

1. Site Details

Site Name:	Woolwich Road Street works	Site Address:	Woolwich Road, Belvedere, Bexley, Greater London, DA17 5EE
NGR:	E: 548855 N: 178278		
Site Ref Number:	BEX16555	Site Type:	Proposed 5G telecoms installation: 18m high 'slim line' Phase 8 H3G street pole c/w wrap around cabinet and 3no. cabinets with ancillary works– to be coloured green.

2. Check List

Site Selection

Was the London Borough of Bexley Council mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: It was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/a		

Pre-application consultation with the London Borough of Bexley Council

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	16th March 2021	
Name of contact: DevelopmentControl@bexley.gov.uk Marissa.golby@bexley.gov.uk	Local Planning Authority and Ward Members – by email	

Summary of outcome/Main issues raised:

H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a Community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home, as well as enjoying access to social, media and gaming for leisure time activities.

The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to adjoining residential properties through the siting of telecommunications infrastructure within urban settings.

Following the submission of an e-mail to the council's planning department, to be best of our knowledge no formal response has been received. The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The information sheet also included other sites that have been investigated and discounted. Further details of the discounted sites are included within this document.

Please note that following the submission of pre-consultation with the LPA and Ward Members and some feedback received, we have, in conjunction with our client reviewed height of the proposed installation and now are coming forward with a reduced height – down to 18 meters monopole and be coloured black to reduce any potential visual impact of this development at this carefully considered site.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	AMBER	

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues.

The site has been given an AMBER rating under the Traffic Light Model 'TLR'.

Summary of outcome/Main issues raised:

Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 as well as the objectives of the National Planning Policy Framework (February 2019).

Full details of the scheme are outlined within the planning drawings BEX16555_PLANNING_REV_B.

H3G consider a 'street works' installation positioned upon Woolwich Road (existing grass verge) is best suited to extend high-speed mobile coverage to the target community. The scheme is also considered to fit with the Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the London Borough of Bexley Council to support the request for plans to speed up digital infrastructure rollout, as outlined by Ministers on the 27th of August 2020.

School/College

Location of site in relation to school/college: Croft Day Nursery is located 236m from the proposed site.
Outline of consultation carried out with school/college: A pre-application enquiry site detail sheet was sent by email to Croft Day Nursery.
Summary of outcome/Main issues raised: To the best of our knowledge no response was received from Croft Day Nursery.

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	31st March 2021	

3. Proposed Development

The proposed site:
The proposed solution for improving 5G coverage here involves erecting a new 18m high H3G 'slim line' Phase 8 street pole c/w a wraparound cabinet and 3 additional equipment cabinets installation upon a small area of grass verge that runs along the side of Woolwich Road, Bexley (E: 548855 N: 178278). The technical details of this proposal are illustrated within the enclosed application design drawings: - BEX16555_PLANNING_REV_B. It is recognised that the very nature of installing new 5G communications infrastructure within an urban setting requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion. Three are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, H3G will need to provide a mix of upgrades involving existing sites and the building of new sites. New sites will be needed for many reasons, including the higher radio frequencies used for 5G, which do not travel as far as those frequencies currently in use. In addition, not all existing sites will have the capacity of being upgraded. The very nature of 5G and the network services it provides, means the equipment and antennas are quite different to the previous and existing, service requirements. In particular, the design of the antennas, and the separation required from other items of associated equipment, is such that we cannot utilise certain structures that provide an installation for another operator, most notably in a street works or highways environment. The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. As with all 5G cells, this is an extremely constrained cell search area and options within the area are extremely limited. Nevertheless, the most viable solution that minimises amenity issues, has been put forward. The site selection process has also been influenced by the topography of the area, trees and vertical elements of street furniture distributed around the vicinity of the site, including street lighting columns. The apparatus (pole and associated cabinets) will be carefully positioned on an existing area of grass verge so not to impede pedestrians and also to have the trees on green area to provide some screening. Please note, the design itself is typical of street furniture found in such urban locations. The decision to site the installation off the footpath on to the grass verge will ensure the pedestrian pavement running along this section of Woolwich Road will remain clear for pedestrians. The equipment is considered unlikely to have any material impact on the local area; however, it should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability. The cell search area was assessed at the survey stage from the perspective of planning and residential amenity, while a detailed site evaluation in line with Policy G25 – Telecommunications as set out within the London Borough of Bexley Councils Local Development Plan. In this location, existing base stations are not capable of supporting additional equipment to extend coverage across the target area and prospective 'in-fill' mast sites are extremely limited.

Other sites have been identified and subsequently discounted (Refer to Section 6, Figure 5). Notwithstanding, there is an acute need for a new telecommunications installation to deliver the required community coverage.

Figure 1 - Site Photographs (extract from google street view, google maps).

Figure 2 – Site Photo (street view from google maps looking west) from Bardolph Avenue. Aspect includes trees, lamp posts, and residential properties.

Figure 3 - Extract from Google street view (street view from google maps looking north-west). Aspect of street furniture, trees, and residential properties.

The proposed site is considered the best available compromise between extending 5G service across the target 'coverage hole' with the selected street works pole height and associated antenna and ground-based cabinets restricted to the absolute minimum, which is capable of providing the required essential coverage.

The equipment cabinets are located at the base of the new pole and (unless the site is situated in Article 2 (3) land), such installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective, as set out in the undernoted planning analysis:

Planning Policy Relevant to the Development Site:

Development Plan Policy: National Planning Policy Framework (February 2019)

Local Planning Authority: London Borough of Bexley Council
Local Plan: Policy G25 – Telecommunications as set out within the London Borough of Bexley Councils Core Strategy 2012.

London Borough of Bexley **Core Strategy February 2012**

4 Managing the built and natural environment

4.3.8 Fit for purpose physical infrastructure will be required to support Bexley's communities and will be essential to the delivery of additional housing and employment growth. The Sustainable Community Strategy seeks to promote planned and appropriate development to ensure new housing and business is supported by adequate facilities and infrastructure.

4.3.9 The Council will continue to work with partners to ensure the ongoing maintenance and development of physical infrastructure networks (transport, water, sewerage, electricity, gas, telecommunications etc). Further details in this respect are set out in Policy CS21.

Scheme	Location	Need for scheme	CS policies	Requirements	Cost	Lead delivery agency	Indicative delivery phasing	Funding arrangements	Priority	Contingency
Telecomm-unications ready for service (RFS) for superfast broadband connection	Borough-wide implemented in Thamesmead, Sidcup, Slade Green. Bexleyheath by December 2010, Crayford and Erith by September 2011	Advances in technology offers significant potential for residents, business enhance-ment and development opportunities	CS01-6 CS08 CS09 CS21	Some 253 cabinets are being installed at exchanges across Bexley with 242 cabinets being upgraded to roll out programme. Further infill cabinets may be required as future development comes forward	Unknown	BT and various service providers	During lifetime of Plan	We have consulted with key delivery bodies throughout development of plan. Plus private investment received by suppliers from their and developers		Phasing of development in particular locations to best utilise existing infrastructure. Ongoing collaboration so suppliers can update their operating and asset plans to meet growth

Policy G25

The Council recognises the need for telecommunications equipment and will seek to ensure that such equipment is located so as to minimise any adverse effects on the character of an area or the visual amenity of the local environment.

4.5.18 Many employment locations could benefit from improved service provision to better support businesses and their employees. This may include workplace crèches as well as improved ICT infrastructure. In respect of the latter, Bexley has been selected by British Telecom as a host location for roll-out of a superfast broadband program, which will enable superfast fiber optic broadband across most of the borough.

❖ Extract from the London Borough of Bexley Council Core Strategy 2012.

We have sought to comply with this policy and also feedback received at the pre-con stage for this Prior Approval submission.

We consider that our proposal is in accordance with Policy G25 – Telecommunications. As part of the process for determining the location of the new mast required to serve this part of Bexley, we conducted a thorough site search. Through our site search we identified that the proposed site does not have an specified designations, however we have still carefully considered the positing and appearance of the telecommunications apparatus. We believe that we have taken the necessary care and attention to the surrounding area in the sitting and appearance of this mast and believe that no adverse impacts would be felt in this area.

Please note that the mast and cabinets are to be coloured green, to further add the assimilation of the mast to the area.

We therefore consider that this proposal is in accordance with Policy G25 – Telecommunications.

In this instance, a new 18-metre-high H3G 'slim line' Phase 8 street pole with associated 3no. equipment cabinets (colour green RAL-6009) are to be positioned upon the area of existing grass verge located on Woolwich Road to reduce any potential visual impact. For the reasons listed above, the proposed site and scheme is not considered to pose an undue onerous material consideration and favourable determination is invited.

The National Planning Policy Framework (NPPF) section of this Supporting Statement goes into detailed analysis of why this site is compliant with the NPPF.

Policy Analysis:

Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:

"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

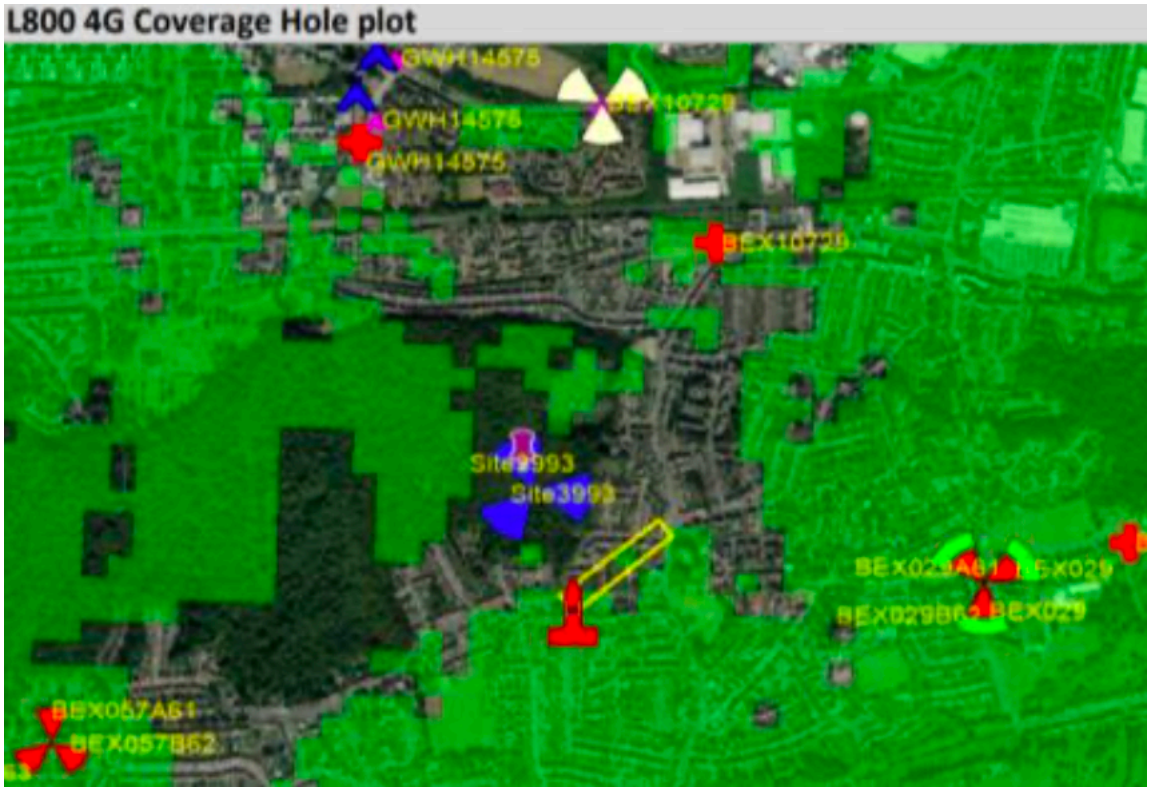
In keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications" (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

The design of the proposed antenna and ground-based cabinets is considered to be the least visually intrusive option available. Whilst it is accepted that there will be a localised visual increase through the installation of additional apparatus, it is considered that this will not overly detract from the character of the existing streetscape.

Enclosed map showing the cell centre and adjoining cells:

The optimum solution from the perspective of cell planning and radio coverage has been put forward. The target Search Area and existing H3G (Three) UK sites are illustrated within Figure 4 below:

Figure 4 - Coverage Map: Proposed installation must be located close to the pink marker – BEX16555.



Type of Structure	
Description: Proposed 'Slim line' Phase 8 Monopole c/w wraparound Cabinet at base and 3 no. additional equipment cabinets.	
Overall Height:	18m AGL
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc. - type of material and external colour:	Phase 8 Monopole, colour GREEN RAL-6009.
Equipment housing - type of material and external colour:	Profile steel cladding, colour GREEN RAL-6009.

Reasons for choice of design:
The proposed installation is an H3G LTE (Three) Phase 8 Monopole which will support the UK Government Digital connectivity vision and provide a basis for support from London Borough of Bexley Council to speed up digital infrastructure rollout set by Ministers on the 27th of August 2020. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home – essential in these times of COVID-19 - as well as enjoying access to social, media and gaming for leisure time activities.

In accordance with the requirement set within National Planning Policy Framework (February 2019) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.

4. Technical Information

ICNIRP Declaration attached ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). Public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.	Yes	

5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it important to explain the positive technical justification for the site and how the facility fits into the overall network. The site is required to provide new 5G coverage for H3G LTE, improving service in and around Gloucester Road/ Harold Avenue/ Victoria Street/ Albert Road. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m. In general, it would not be feasible to site the installation too far from the target locale (Refer to Figure 4).

6. Site Selection Process – alternative sites considered and not chosen.

Discounted Options
In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated. This sequential approach is outlined below: a) Mast and Site Sharing b) Existing Buildings Structures

c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:

"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure".

Typical to most 5G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of installing new 5G mast infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion. A Street Pole with associated cabinets is deemed to be the only and most appropriate solution available. The DSA (Designated Search Area) is illustrated in Figure 5, together with site locations that were investigated and subsequently discounted.

The DSA is located within Belvedere, Bexley, Greater London, England. The DSA is focused heavily on a residential setting with the wider DSA in the area of the radio planners arrow continuing deeper into the residential area away from Woolwich Road. There are many small residential side streets packed with detached houses branch off intermittently from Woolwich Road, with few privately maintained roads. Option is on existing grass verge adjoining Woolwich Road, Belvedere, Bexley, Greater London.

Following a site search we have concluded that the site put forward is the best solution to bring enhanced 5G service to this area. We have strived to find the most suitable site and we believe that given the presence of tall trees, lampposts and telegraphs poles in the immediate vicinity, this site is suitable for the proposed new telecoms installation.

Discounted Options:

As part of the site search and discounting of potentially suitable locations, the streets and properties were visited and for the reasons given discounted.

Site Reference	Reason why discounted
D1 - Gloucester Road	Narrow pavement and proximity to residential property.
D2 - Harold Avenue	Proximity to Nursery and residential property.
D3 – Victoria Street	Narrow pavement and proximity to residential property.
D4 – Albert Road	Narrow pavement and proximity to residential property.

Figure 5 - Proposed Site Location: 100m DSA (Desired Search Area) shown circled.

7. Additional Relevant Information

Background to the Proposal

H3G supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the London Borough of Bexley Council area and specifically in this instance, to enhance 5G coverage levels in and around Gloucester Road/ Harold Avenue/ Victoria Street/ Albert Road.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a Community.

DEVELOPMENT PLAN POLICY:

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, stated that:

"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."

NATIONAL PLANNING POLICY:

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications.

The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

"Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)."

It continues in Paragraph 113

"The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded, this will always be adhered to before a new installation is put forward for consideration. In this instance, there is no scope to upgrade existing infrastructure or site share with other operators.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116.

"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure."

In addition to the above, we would also draw to your attention a recent Appeal Decision which followed on the back of a refused planning application within Walworth, London, SE17 3DU. The application (ref: 20/AP/1187) was refused on the following grounds: - 1) The 20m monopole does not comply with part (a) of Part A.1 of 16 of the GPDO 2015 and 2) The proposed cabinets and monopole would introduce excessive clutter on the footway, disrupting pedestrians. The appeal was brought by Hutchison 3G (UK) Ltd against the Council of the London Borough of Southwark. The appeal was allowed on the 10th of November 2020 (Appeal Reference: APP/A5840/W/20/3254830).

Conclusion

Government considers that high-speed mobile connectivity is the lifeblood of a Community. H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed 18-meter-high street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

The use of the public highway to accommodate a new telecommunications installation complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community, while minimising visual impact. In this particular instance, following an initial desktop survey and subsequent physical search of the intended area, due to the nature of the proposed equipment, location (existing grass verge alongside trees and bushes), existing street furniture (including street lighting columns), after careful analysis, we believe the proposed site will minimise any visual impact upon the immediate and wider area, while at the same time, significantly improving communications within the local vicinity.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework and along with the Council's Local Plan (2012) and in particular Policy G25 – Telecommunications.

On this basis, favourable determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.

Contact Details

Name: (Agent)	Hannah Gibson BA (Hons)	Telephone:	07428 015034
Operator:	H3G	Fax no:	N/A
Address:	Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP	Email Address:	h.gibson@dotsurveying.co.uk
Signed:	HGibson	Date:	31st March 2021

Position:	Planner	Company: (on behalf of above operator)	Dot Surveying Ltd